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November 27, 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

Regarding Comments to Notice of Inquiry in the Matter of Administration of the North American Numbering Plan FCC Docket No. 92-237.

The following comments are based on experience with network integration of the North American Numbering Plan on Inter-exchange Carrier (IXC) Networks. In the past, requests to North American Numbering Plan Administration (NANPA) for Guidelines, Assignments of Carrier Identification Codes (CIC), Card Issuer Identification Codes (CIID) and 891 Card Issuer Identifications have adequately been responded to. Assistance by BELLCORE for access to network tools has also been requested and changes facilitated to BELLCORE Products Terminating Point Master (TPM), Local Exchange Routing Guide (LERG) and Vertical & Horizontal Code (V&H) Tapes.

Currently TELCO Planning has inter-action with NANPA and the industry regarding the assignment of Area code-555 and line numbers to companies wanting to provide directory assistance. The following comments are directed to Phase One of the Notice Of Inquiry, as suggestions for inclusion in a solution.

#### Observations

TELCO Plannings' belief is that the foresight in planning number assignments into the original toll network as a monopoly was phenomenal. The work was done with considerable concern for end-user inter-action, as if the network needed to do what the end-user wanted. Recent changes to the competitive environment have strained the application of number assignments. At this point in history, and the volume of valid requested guidelines at the ICCF, numbering issues need to be resolved elsewhere. NANPA appears to be getting requests that are competitive to its sponsoring clients. In addition NANPA may be a financial drain on BELLCORE and it's clients. At a minimum, it would be unfair for the industry to require the costs be born by an entity that cannot control the results of which could be detrimental to it's sponsor.

Today's administration by NANPA as a BELLCORE responsibility is obsolete. It appears from our discussions with NANPA that solutions to the competitive world of telecommunications today have been weighted to integrate with existing networks. The vial of anti-trust covers many new requests because more than 60% of local access to the public switched telephone network (PSTN) happens to be through BELLCORE clients. Another large percentage of access is through General Telephone. Both the BELL network and GTE companies own competitive network businesses such as Personal Communications Service companies and licenses. These other business interests require new competitive technologies to the "embedded base". The subsidiaries within the parent corporations are obviously competing for both market share and future primary choice status among end-users. These

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subsidies are having problems entering a market which is competitive to its parent company.

Because of the individuals within NANPA, TELCO Planning believes that the conflict in administration is not intentional or at the individual level. TELCO Planning believes a conflict exists in the understanding of the future architecture of the PSTN. The conflict does not exist in BELLCORE clients giving directives to NANPA but certainly a lot of input is offered and requested by client companies to make changes that will accommodate downward compatibility. NANPA does take virtually any call from anyone today, although experience reveals that client company requests or requests from companies with sufficient legal resources get formal responses.

As a result the current lobbying for numbering has been not to force firm/soft/hardware changes to existing equipment. TELCO Planning believes a lot more effort needs to be extended to modifying the existing PSTN equipment and Operational Support Systems (OSS).

Our belief is the PSTN will need to operate as a seamless integration gateway to many public owned networks (IE LEC toll and local, IXC toll and local and Wireless toll and local). To accomplish this, new network entrants will require non-geographic and portable addresses for it's end-users.

Another major decision facing the embedded base involves Inter-changeable Numbering Plan Area Codes. Unfortunately TELCO Planning has not seen representations of the fill-rates within existing area and office codes. Technology exists for each telephone number to be assigned several trunks/circuits. Each end-user location should have a pilot number. Users of private telephone numbers for provisioning CENTREX, DIDs or pagers should be properly accounted for. Conservation and reclamation have not adequately been addressed.

Today's solutions consist of NANPA guidelines (of which more and more NANPA is seeking comments or task force solutions), internal LEC and IXC policies and finally the Industry Carrier Compatibility Forum (ICCF). The forums, task force and internal policies each have an integral part of which new technologies currently have found to be a burden when rolling out new products.

#### Comments

To obtain the results TELCO Planning believe are requested by end-users and the industry, the FCC must intervene. The FCC should request that a new NANPA consist of member nations for a universal numbering plan. The numbering plan must include:

- \* the dynamics of a competitive environment within the United States and integrate with non-competitive government owned networks in foreign nations.

- \* inclusion of a universally accepted dialing plan for end-users into the PSTN. Note; dialing plan concerns should be considered part-in-parcel with the numbering plan.



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\* continuation of LERG, TPM and V&H products as OSS support building blocks to the numbering plan.

\* an audit/accounting of existing fill-rates for currently provisioned numbers and reported to the F.C.C.

\* responsiveness to existing issues during transition should be monitored by the FCC.

\* the new NANPA should have dotted-line review of network access dialing plans between networks.

TELCO Planning believes that a new group needs to be established with a different funding source. The entity should allow input from network owners and equipment manufacturers. Input from end-users are not to be ignored but should not be the pre-requisite. The solutions should be decided by those that invest in networks and are required to live with the return on investment obtained.

Regardless of the inter-network dialing from node to node, end-users need a dial-plan that is easy to understand as the existing one is with dialing plans requiring 1 as a prefix digit to indicate a toll or off-net call. To get a more complete fill rate out of existing codes, area numbering plan administrators should consider assignments to PCS networks within under-utilized codes not geographic assignments.

TELCO Planning suggests a new NANPA be developed as a neutral forum with representatives from diverse industry groups. The management of diverse needs should be addressed through sub-committees dealing with the impacts on end-users dialing plans, network dialing plans. Finally, the most frustrating part of today's environment is to develop time lines for resolutions. Numbering needs should have a short introduction and evaluation time frame. A short time frame should be less than three months of dissemination of the need to NANPA. The work period should be less than six-months and the comment cycle should be less than three-months, within the resolution period. Any issue requiring more than six-months to resolve should be resolved by the State Department or an international committee.

Regarding the Phase Two of the NOI, TELCO Planning feels the mere presence of the need to review this issue, four years after first consideration by existing forums is enough evidence that today's solutions are not solving tomorrow's needs.

Sincerely,

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